February 29, 2008

## Via Electronic Comment Filing System

Marlene H. Dortch Office of the Secretary Federal Communications Commission 445 12th Street, S.W. Washington, DC 20554

Re: Teletronics Services, Inc. CPNI Compliance Certification EB Docket No. 06-36

Dear Ms. Dortch:

On behalf of Teletronics Services, Inc. and pursuant to 47 C.F.R. § 64.2009(e), enclosed is the company's 2007 CPNI Certification.

Very truly yours,

Gale Kenney

Enclosure

ce: Enforcement Bureau Telecommunications Consumers Division (2 copies)

Best Copy and Printing, Inc. (via e-mail)

## Annual 47 C.F.R. § 64.2009(e) CPNI Certification EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2007

Date filed: February 29, 2008

Name of company covered by this certification: Teletronics Services, Inc.

Form 499 Filer ID: 825512

Name of signatory: Gale Kenney

Title of signatory: Chief Executive Officer

I, Gale Kenney, certify that I am an officer of Teletronics Services, Inc. ("Teletronics") and acting as an agent of Teletronics, that I have personal knowledge that Teletronic has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 et seq.

Attached to this certification is an accompanying statement explaining how Teletronic's procedures ensure that it is in compliance with the requirements set forth in section 64.2001 et seq. of the Commission's rules.

Teletronics affirms that it has not taken any actions against data brokers in the past year nor have any pretexters attempted to access CPNI.

Teletronics affirms that is has not received any customer complaints in the past year concerning the unauthorized release of GPNV.

Signed Gale Kenney

Chief Executive Officer

Teletronics Services, Inc.

## STATEMENT OF COMPLIANCE WITH CPNI RULES

Teletronics Services, Inc. (the "Company") is primarily a provider of integrated telecommunications systems, including sales of telephone systems, voice processing and related sales of cabling and other equipment, primarily in the Cleveland, Ohio area. The Company also provides single billing of certain telecommunications services as part of its systems integration services. Further, as a reseller, the Company provides long distance telecommunications services to certain of its telephone systems customers. The Company is an agent for other telecommunications carriers, offering other services such as access products like 800 or switched access.

The Company has elected to utilize or provide CPNI only for purposes that are permissible without customer approval in accordance with 47 C.F.R. § 64.2005. Accordingly, the Company currently does not use CPNI in a manner that requires customer approval and is not required to implement a system by which the status of a customer's CPNI approval can be established prior to the use of CPNI. Therefore, as permitted by the CPNI rules, the Company may use CPNI (1) to bill and collect for services rendered; (2) to protect rights or property of the Company, other users or other carriers from unlawful use; (3) to provide customer premises equipment and protocol conversion; (4) to provision inside wiring, maintenance and repair services; and (5) to market services formerly known as adjunct-to-basic services, such as, but not limited to, speed dialing, computer-provided directory assistance, call monitoring, call tracing, call blocking, call return, repeat dialing, call tracking, call waiting, caller I.D., call forwarding, and certain Centrex features. The Company does not share, sell, lease and otherwise provide CPNI to any unrelated third parties for the purposes of marketing any services.

The Company has implemented processes and procedures to train its personnel as to when they are and are not permitted to use CPNI. For instance, all Company employees are required to abide by the Company's Code of Conduct, which requires employees to maintain the confidentiality of all information that is obtained as result of their employment by the Company. Employees who violate the Company's Code of Conduct will be subject to discipline, including possible termination.

The Company does not currently engage in any large-scale coordinated sales and marketing campaigns. The Company does some limited marketing of new services to existing customers on a case-by-case basis. Records of these customer contacts are maintained in Company databases. Specifically, the Company utilizes a contact management database that tracks customer contacts made by Company sales and marketing employees, and the Company utilizes an account management and trouble ticketing system that documents all contacts with customers. These records are maintained for at least one year. All marketing campaigns are supervised by the Vice President of Sales who maintains records of such supervision for at least one year.

The Company ensures that it does not provide CPNI to any customer on an inbound call without proper customer authentication. The Company does not use, maintain or otherwise collection call detail information from its customers. Certain customers have equipment that can

collect call detail information and the Company only could gain access to that information if the customer affirmatively granted such access to a Company technician. The Company does not provide online account access for its customers.

If a customer's address changes, the Company will notify the customer of that change. Since the Company does not have passwords or back-up secret questions for lost or forgotten passwords and does not offer online account access, the Company is not required to notify customers of changes to these items. In the event of a breach of CPNI that is maintained by the Company, it will provide law enforcement with notice of such CPNI breach. After notifying law enforcement and unless directed otherwise, the Company will notify affected customers and will maintain a record of any CPNI-related breaches for a period of at least two years as required by the applicable FCC CPNI rules.

In the event the Company changes it marketing practices to provide an opt-out to customers, it will implement procedures to ensure that it will provide written notice to the FCC within five business days of any instance where the opt-out mechanisms do not work properly in accordance with 47 C.F.R. 64.2009(f).